

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

THE SUDDATH COMPANIES,

Plaintiff,

v.

THE UNITED STATES,

Defendant,

and

HOMESAFE ALLIANCE LLC,

Proposed Defendant-Intervenor.

Case No. 1:24-cv-01836
Judge Zachary N. Somers

**UNOPPOSED MOTION TO INTERVENE OF PROPOSED DEFENDANT-
INTERVENOR HOMESAFE ALLIANCE LLC**

Pursuant to Rule 24 of the Rules of the United States Court of Federal Claims, HomeSafe Alliance LLC ("HomeSafe") respectfully moves to intervene as of right or (alternatively) permissively in the above-captioned case. HomeSafe counsel hereby represents that Plaintiff and Defendant do not oppose this motion. In support of its motion, HomeSafe states as follows.

HomeSafe is the contract awardee under Solicitation No. HTC711-19-R-R004 (the "Solicitation") issued by the United States Transportation Command ("USTRANSCOM" or the "Agency"). The record before this Court likely will involve HomeSafe proprietary information. Plaintiff The Suddath Companies has filed a protest related to the contract.

Under RCFC 24(a)(2), HomeSafe, as an awardee, may intervene as a matter of right because HomeSafe has an interest relating to the subject matter of this action and is "so situated that disposing of the action may as a practical matter impair or impede [HomeSafe's] ability to protect its interest..." RCFC 24(a)(2). Alternatively, this Court should exercise its discretion to

permit HomeSafe to intervene pursuant to RCFC 24(b) because Plaintiff has made allegations impacting HomeSafe and HomeSafe has rights related to the action. RCFC 24(b)(1)(B). No party to the action is situated to protect HomeSafe's interests. Permitting HomeSafe to intervene will not cause delay, and will ensure that the Court has a complete and accurate picture of the facts and circumstances surrounding this protest, including the substantial harm that HomeSafe will suffer if the Court grants relief to Plaintiff.

WHEREFORE, HomeSafe respectfully requests that the Court grant this motion to intervene.

Dated: November 13, 2024

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Craig A. Holman

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